UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

YANA EDQUIST,))
Plaintiff,)
v.)) DOCKET NO.: 14-CV-14133
JACKSON NATIONAL LIFE INSURANCE COMPANY,)))
Defendant.))

STIPULATION BETWEEN PLAINTIFF YANA EDQUIST AND DEFENDANT JACKSON NATIONAL LIFE INSURANCE COMPANY REGARDING PENDING DEADLINES

Plaintiff Yana Edquist ("Ms. Edquist") filed a complaint in this case in Middlesex County Superior Court on September 2, 2014. Defendant Jackson National Life Insurance Company ("Jackson") accepted service by mail on October 14, 2014. Included with Ms. Edquist's service papers were requests for admission and requests for production of documents directed to Jackson. Jackson removed the case from Middlesex County Superior Court to the United States District Court for the District of Massachusetts on November 11, 2014 [ECF Dkt. 1]. In order to formalize two stipulations for extension of time reached between Ms. Edquist and Jackson, both parties agree and state as follows:

- (a) Jackson shall have up to and including December 17, 2014 in order to answer or otherwise respond to Ms. Edquist's complaint;
- (b) Jackson shall have up to and including thirty (30) days after Ms. Edquist and Jackson conduct a Rule 26(f) conference in order to answer Ms. Edquist's requests for production of

documents and requests for admission served while the matter was pending in Middlesex County Superior Court.

SO STIPULATED THIS 2nd DAY OF DECEMBER 2014.

/s/ Walter H. Jacobs

/s/ Matthew C. Welnicki

Matthew C. Welnicki

Melick & Porter, LLP

Walter H. Jacobs

W. Jacobs and Associates at Law, LLC

795 Turnpike Road

North Andover, MA 01845

Tel.: (978) 688-0900

E-mail: wjacobslaw@gmail.com

One Liberty Square Boston, MA 02109 Tel.: (617) 523-6200

E-mail: mwelnicki@melicklaw.com

Counsel for Plaintiff Yana Edquist

Stephen C. Baker Alan M. Kidd

Pro hac vice admission to be requested

Drinker Biddle & Reath LLP One Logan Square, Suite 2000

Philadelphia, PA 19103 Tel.: (215) 988-2700

E-mail: Stephen.Baker@dbr.com E-mail: Alan.Kidd@dbr.com

Counsel for Defendant Jackson National Life Insurance Company

CERTIFICATE OF SERVICE

I, Matthew C. Welnicki, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Walter F. Jacobs, Esquire W. Jacobs and Associates at Law, L.L.C. 795 Turnpike Road North Andover, MA 01845 Counsel for Plaintiff Yana Edquist

/s/Matthew C. Welnicki
Matthew C. Welnicki

Dated: December 3, 2014